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Attorneys for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**GOOGLE LLC'S ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED**

Judge: Hon. Yvonne Gonzalez Rogers

I. INTRODUCTION

Pursuant to Civil Local Rules 7-11 and 79-5(F), Defendant Google LLC (“Google”) respectfully submits this Administrative Motion to Consider Whether Another Party’s Material Should be Sealed pertaining to the following information indicated below, which contain, reflect, or summarize information designated by Plaintiffs as confidential under the terms of the Stipulated Protective Order (Dkt. 81):

Document	Portions to be Filed Under Seal	Party Claiming Confidentiality
Plaintiff Chasom Brown’s Verified Amended Objections and Responses to Defendant Interrogatories 1, 4, and 5	Highlighted Portions at: Pages 4-7	Plaintiffs
Plaintiff William Byatt’s Verified Amended Objections and Responses to Defendant Interrogatories 1, 4, and 5	Highlighted Portions at: Pages 4-7	Plaintiffs
Plaintiff Christopher Castillo’s Verified Amended Objections and Responses to Defendant Interrogatories 1, 4, and 5	Highlighted Portions at: Pages 4-7	Plaintiffs
Plaintiff Jeremy Davis’ Verified Amended Objections and Responses to Defendant Interrogatories 1, 4, and 5	Highlighted Portions at: Pages 4-7	Plaintiffs
Plaintiff Monique Trujillo’s Objections and Responses to Defendant’s First and Second Set of Interrogatories	Highlighted Portions at: Pages 3-4, 6-7	Plaintiffs
Exhibit 16 to Broome Declaration Plaintiff William Byatt’s Objections and Responses to Defendant’s Fourth Set of Interrogatories	Highlighted Portions at: Page 16	Plaintiffs
Exhibit 21 to Broome Declaration Plaintiff William Byatt’s Objections and Responses to Defendant’s Third Set of Requests for Admission	Highlighted Portions at: Page 7	Plaintiffs

Exhibit 25 to Broome Declaration	Highlighted Portions at: Page 10:7-8	Plaintiffs
Deposition Excerpts of William Byatt		
Declaration of Jonathan McPhie Regarding Google Disclosures	Highlighted Portions at: Pages 22:21, 22:23, 22:25, 23:2, 23:4, 23:6	Plaintiffs

Google respectfully requests that the above-identified information provisionally remain under seal. Pursuant to Civil Local Rule 79-5(f), Plaintiffs bear the responsibility to establish that the above-identified information is sealable.

DATED: August 5, 2022

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By /s/ Jonathan Tse

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